



Office of Telecommunications

Netzer Administration Building
State University of New York
Oneonta, New York 13820-4015
(607) 436-2577 Fax: (607) 436-2616

Received & Inspected

NOV 03 2008

FCC Mail Room

October 27, 2008

The Honorable Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street, SW, Room 8-B201
Washington, DC 20554

The Honorable Michael J. Copps
Commissioner
Federal Communications Commission
445 12th Street, SW, Room 8-B115
Washington, DC 20554

The Honorable Jonathan S. Adelstein
Commissioner
Federal Communications Commission
445 12th Street, SW, Room 8-A302
Washington, DC 20554

The Honorable Deborah Taylor Tate
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Federal Communications Commission
445 12th Street, SW, Room 8-A204
Washington, DC 20554

The Honorable Robert M. McDowell
Commissioner
Federal Communications Commission
445 12th Street, SW, Room 8-C302
Washington, DC 20554

Re: Universal Service Contribution Methodology
WC Docket No. 06-122
Federal-State Joint Board on Universal Service
CC Docket No. 96-45

Dear Commissioners:

I am writing on behalf of the State University of New York, College at Oneonta in response to reports that the FCC is considering a proposal to change the current system for determining the amount of contributions to the federal Universal Service Fund. As I understand this proposal, the FCC intends to base contributions to the fund from residential customers on how many telephone numbers are assigned to each carrier's customers, to retain the current revenue-based contribution mechanism for commercial customers, including colleges and universities, and to request comments on whether to modify the contribution system for commercial customers in the future. Further, it appears that the proposal rejects a suggestion by AT&T and Verizon that all contributions, including those from commercial customers, should be based on telephone number assignments. For the reasons described below, SUNY Oneonta believes that the FCC should not adopt any modification that uses telephone numbers to calculate commercial customers' contributions to the federal Universal Service Fund, and that the FCC should retain the current revenues-based system for commercial services until it can devise a system that does not impose an inequitable burden on large users of telephone numbers, including colleges and universities.

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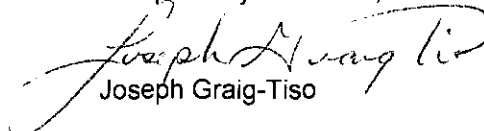
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In accordance with Section 1.1206 of the Commission's rules, four copies of this letter are being filed with the Secretary's office on this date.

Please inform me if any questions should arise in connection with this letter.

Respectfully submitted,



Joseph Graig-Tiso

Director of Telecommunications
SUNY College at Oneonta

cc: Daniel Gonzalez
Amy Bender
Scott Deutchman
Scott Bergmann
Greg Orlando
Nicholas Alexander
Dana Shaffer
Jeremy Marcus
Alexander Minard
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Cindy Spiers
James Lande
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Re: Universal Service Contribution Methodology
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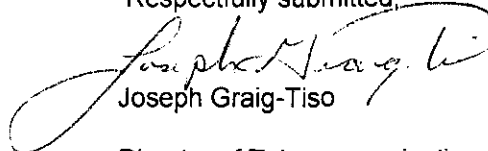
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Respectfully submitted,



Joseph Graig-Tiso

Director of Telecommunications
SUNY College at Oneonta

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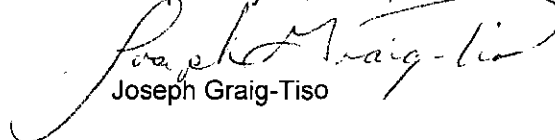
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Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Joseph Graig-Tiso", is written over the typed name.

Joseph Graig-Tiso

Director of Telecommunications
SUNY College at Oneonta

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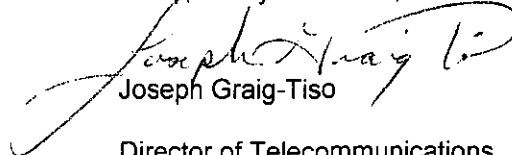
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